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Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON :
HEALTH CARE SYSTEMS INC., : Civil Action No. 22-2632(JKS)(CLW)

: Plaintiff, Hon. Jamel K. Semper, U.S.D.J.

: vs. Hon. Cathy L. Waldor, U.S.M.J.

: Hon. Freda L. Wolfson, Special Master

SAVE ON SP, LLC, : **NOTICE OF MOTION TO SEAL**

: Defendant.

COUNSEL:

PLEASE TAKE NOTICE that on July 15, 2024 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems, Inc. ("JJHCS") will apply

before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, to (a) permanently maintain under seal the letters and supporting exhibits filed by counsel for the parties regarding (i) Defendant Save On SP LLC's Motion to Compel CAP Search Terms, dated February 16, 2024, with related briefing on February 28 and March 4, 2024 (ECF No. 277); (ii) JJHCS's Application that Exhibit 81 be Withdrawn from the Court's Docket, dated January 29, 2024, with related briefing on February 6, 8, 9, 16, 20, 22 and March 29, 2024 (ECF No. 289); and (iii) Defendant Save On SP, LLC's Motion to Compel regarding Early Terms and Conditions and Search Terms, dated March 12, 2024, with related briefing on March 20 & 22, 2024 (ECF No. 282), and (b) permit JJHCS to file the proposed public versions of ECF Nos. 277, 289, and 282, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion ("Greenbaum Declaration").

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and indices in support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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By: s/ Jeffrey J. Greenbaum
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Dated: June 18, 2024